SUBPOENA

E. Ex. 3

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Custodian of</u>	Records, IAMA	W Local District Lodge 725, 5402 Bolsa	Ave	nue, Huntington B	each, CA 9	2649
As requested by	RadNet Mana	gement, Inc. d/b/a San Fernando Valley	Inter	ventional Radiolog	gy and Ima	ging Center
whose address is	16311 Ventu	ıra Blvd., Suite 120, Encino, CA 91436				
	(Street)	(City)			(State)	(ZIP)
YOU ARE HERE	BY REQUIRED	AND DIRECTED TO APPEAR BEFORE	<u>a</u>	Hearing Officer		
at 11500 W. Olym	pic Blvd., Suite 600			of the Natio	nal Labor R	telations Board
	s Angeles, CA					
on January 29,	2018	C 30-73	at	9:00 am	or	any adjourned
or rescheduled da	ate to testify in	RadNet Management, Inc. d/b/a Sa and Imaging Center (31-RM-20938 Fernando Valley Advanced Imagin (Case Name an	(8) and g Ce	nd RadNet Mana enter (31-RM-209	igement, Ir	al Radiology nc. d/b/a San

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filling. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZP9NBN

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

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I certify	ge, I duly s

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

10 Custodian of Records, IAMAW Local District Lodge 725, 5	+02 Boisa Avenue, Huntington Beach, CA 92649
As requested by RadNet Management, Inc. d/b/a Sa	n Fernando Valley Advanced Imaging Center
whose address is 14860 Roscoe Blvd., Suite 101, Panorama	City CA 91402
(Street)	(City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR	RBEFORE a Hearing Officer
	of the National Labor Relations Boa
at 11500 W. Olympic Blvd., Suite 600	
in the City of Los Angeles, CA	
on <u>January 29, 2018</u>	at 9:00 am or any adjourned
and Imaging Center (31-R or rescheduled date to testify in Fernando Valley Advance	d/b/a San Fernando Valley Interventional Radiolog M-209388) and RadNet Management, Inc. d/b/a San d Imaging Center (31-RM-209424)
(Case	Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPAHDB

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman



NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

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on the named person on
(Month, day, and year)
(Name of person making service)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

on (Month, day or days, and year)

(Official title)

(Name of person certifying)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

10 Ryan Carrillo, IAMAW Loca	al District Lodge 725, 5402 Bolsa Avenue, I	Huntington Beach,	CA 92649	
As requested by RadN	et Management, Inc. d/b/a San Fernando	Valley Advanced Im	naging Center	V. 4
whose address is 14860 Rosco	pe Blvd., Suite 101, Panorama City, CA 914	402		
(Street)	(City)		(State)	(ZIP)
YOU ARE HEREBY REQUIRED at 11500 W. Olympic Blvd., Suite 600	AND DIRECTED TO APPEAR BEFORE	a Hearing Officer of the Nation	onal Labor Rela	ations Board
in the City of Los Angeles, CA				
on <u>January 29, 2018</u>	а	t <u>9:00 am</u>	or ar	ny adjourned
or rescheduled date to testify in	RadNet Management, Inc. d/b/a San I and Imaging Center (31-RM-209388) Fernando Valley Advanced Imaging ((Case Name and N	and RadNet Mar Center (31-RM-20	nagement, Inc	
	(Odoo Hamo and I	turribor)		

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPAAZL

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

board, triis Odbpoeria is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman



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by person	by certified mail	by registered mail	by telegraph	by leaving copy at principal office or place of business at		and year)	laking service)	, if any)	OF SERVICE	s in		
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□ by perso				(Check method used.)	on the named person on		(Nar		GE	I certify that named person was in	attendance as a witness at	uo

(Name of person certifying)

(Official title)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Ryan Carrillo	, IAMAW Local D	istrict Lodge 725, 54	102 Bolsa Avenue, Hui	ntington Beach, (CA 92649	
As requested by	RadNet Manage	ment, Inc. d/b/a Sar	n Fernando Valley Inte	rventional Radio	logy and Imagi	ng Center
whose address is	16311 Ventura	Blvd., Suite 120, Er	ncino, CA 91436			
	(Street)		(City)		(State)	(ZIP)
YOU ARE HEREE	BY REQUIRED A	ND DIRECTED TO	APPEAR BEFORE a	Hearing Officer		
at 11500 W Olymp				of the Nat	ional Labor Re	lations Board
at 11500 W. Olymp	ic Blvd., Suite 600					
in the City of Los	Angeles, CA					
on January 29, 2	2018		at	9:00 am	or a	ny adjourned
or rescheduled dat		and Imaging Cente	ent, Inc. d/b/a San Fe er (31-RM-209388) a dvanced Imaging Co	and RadNet Ma	nagement Inc	l Radiology c. d/b/a San
			(Case Name and Nu	mber)		

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A-1-ZP9ZXT

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman

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nis subpoena	by person	by certified mail	by registered mail	by telegraph	by leaving copy at principal office or place of business at		(Month, day, and year)	(Name of person making service)	(Official title, if any)	CERTIFICATION OF SERVICE	n was in			(Month, day or days, and year)	(Name of person certifying)
age, I duly served a copy of this subpoena					(Check method used.)	on the named person on	(Month,	(Name of pers	(Officie	CERTIFICAT	I certify that named person was in	attendance as a witness at	on	(Month, day	d Jo ema()

(Official title)

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

Custodian of Records, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649 To

RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center As requested by whose address is 14860 Roscoe Blvd., Suite 101, Panorama City, CA 91402 (Street) (City) (State) (ZIP) YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer of the National Labor Relations Board at 11500 W. Olympic Blvd., Suite 600 in the City of Los Angeles January 29, 2018 on 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology

Fernando Valley Advanced Imaging Center (31-RM-209424) or rescheduled date to testify in

and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San

(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBF05

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

January 17, 2018

Marvin Kaplan, Chairman

- Thath-

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RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a conv of this subsection

(1	(Name o	(M	n the named person on	(Check method used.)					age, I duly served a copy of this subpoena
Official	of perso	onth, di	_						y of thi
(Official title, if any)	(Name of person making service)	(Month, day, and year)		by leaving copy at principal office or place of business at	by telegraph	by registered mail	by certified mail	by person	s subpoena

CERTIFICATION OF SERVICE

I certify that named person was in

attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER

: Case No.

: 31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBF05

By service of Subpoena *Duces Tecum* No. B-1-ZPBF05, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production,

identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs the Union that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union, the NUHW, or any Employee.
- 3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to any Employee in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to the NUHW in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc.

RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW to the Union in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT NATIONAL LABOR RELATIONS BOARD RC PETITION

DO NOT WRITE IN THIS SPACE Case No. 31-RC-208646 Date Filed

10/26/2017

INSTRUCTIONS: Unless e	Filed using the Age	ncy's website,	www.nirb.gov, submit a	an original of th	is Petition to	an NLRB office in the Region
in which the employer cor	icerned is located.	The petition mu	ist be accompanied by	both a showing	of interest (s	ee 6b below) and a certificate
of service showing service	on the employer a	nd all other pan	ties named in the petiti	on of: (1) the pe	tition; (2) Sta	tement of Position form
with the NLRB and should	not be served on the	e employer or	any other party		7.	nterest should only be filed
1. PURPOSE OF THIS PETITIO	N: RC-CERTIFICATION	OF REPRESENTA	ATIVE - A substantial number	Potitionne stlamas	that the fallowing	mer electrometaneous autoband
2a. Name of Employer	more hyperbolic boorse p	1 26.	Address(es) of Establishmen	t(s) involved /Stree	and number of	iv State ZIP codel
RadNet Inc. and Radnet Ma		ployers see	attachment			91 41414, 411 40007
3a. Employer Representative - Christopher Catalano	Name and Title	······································	3b. Address (If same a 18133 Ventura Bl		Tarzana, (CA 91356
3c. Tel No (818) 933-2020 ext 126	3d. Cell No. 1 (805) 750)-1013	3e. Fax No.		31. E-Mail Ad chris.cata	dress lano@radnet.com
4a. Type of Establishment (Fack	ory, mine, wholesaler, etc		product or service			y and State where unit is located:
Healthcare facility		Outpatient	Imaging services		see a	ttachment
5b. Description of Unit Involve included: All full-time, ar	nd regular part-tin	ne, per diem F	RN and Technical en	nployees, emp	oloyed by	Sa. No. of Employees in Unit: 115
the employer in Excluded: All other employer supervisors as de	es, managers, confide	ne San Fema ential employees,	ndo Valley Region lis , guards, physicians, servi	sted in 2b. ice, office clerical	s and	5b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes 7 No
Check One: 7 7a Ro	quest for recognition as E 0/11/2017 [Det	largaining Represe	ntative was made on (Date)	10/11/2017	and Employer de	clined recognition on or about
7b. Pet	itioner is currently recon-	sized as Bargaining	Representative and desires	certification under the	to Ant	
8a. Name of Recognized or Cer none	tified Bargaining Agen	t (If none, so state	e). Sb. Address			
8c. Tel No.	8d Cell No.		Se. Fax No.		8f. E-Mail Ad	dress
8g. Affiliation, If any			8h, Date of Recognition o	r Gertification		Date of Current or Most Recent ny (Month, Day, Year)
8. Is firere now a strike or picketi	ng at the Employer's esta			dmately how many	employees ere p	articipating?
(Name of labor organization)			picketed the Employer since (
in Organizations of individuals of individuals of	mer than Petitioner and nterest in any employees	those named in iter in the unit describe	ms 8 and 9, which have claim ed in item 5b above. (If none	ed recognition as re , so state)	presentatives a	nd other organizations and individuals
10a, Name	103.	Address	TO THE TOTAL PROPERTY OF THE PARTY OF THE PA	10c, Tel, No.		10d Cell No.
				10e, Fax No.		10L E-Mail Address
 Election Details: If the NLR any such election. 			your position with respect to	11a, Election Typ	e: Manual	Mail Mored Manual/Mail
13b, Election Date(s): Multireg HANDASTERD 11/7	117-11/21/17	. Election Time(s):		11d. Election Loc	ation(s):	
National Union of Healthca	icluding local name and ITE Workers			15801 Christie Av	eef and number, re. Suite 525.	. city, state, and ZIP code) Emeryville, CA 94608
12c. Full name of national or inte none	metional tabor organizati	on of which Pelition	ner is an affiliate or constituen	it (if none, so state)		
120. Tel No. (510) 834-2017	12e. Cell No		12f. Fax No.		12g. E-Meil /	Address
13. Representative of the Petiti	oner who will accept so	rvice of all papers	s for purposes of the repres	entation proceeds	ng.	
13a. Name and Title Sophi				d number, city, state		
13c, Tel No.	13d, Cell No (213) 280-0	051	13e. Fax No. (818) 241-0141	**************************************	13f. E-Meil A smendoza@	
I declare that I have read the al			true to the best of my know	vledge and belief.	1	
Name (Print)	Square	MILAN	T Title		Date	
Florice Hotiman	POLICIA	0-101-100	7701 Attornov	A. L. L.	1398	10/24/17
WILLFUL FALSE	STATEMENTS ON THIS	PETITION AND	E PUNISHED BY FINE AND	IMPRISONMENT (U.S. CODE, TIT	LE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942–43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary, however, felture to supply the information will cause the NLPB to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Ryan Carrillo, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by Ra	adNet Management, Inc. d/b/	a San Fernando Va	alley Advanc	ed Imaging Center	
whose address is 14860 Ro	scoe Blvd., Suite 101, Panor	ama City, CA 9140	2		
(Stree	et)	(City)		(State)	(ZIP)
YOU ARE HEREBY REQUIRE	D AND DIRECTED TO APP	EAR BEFORE		a Hearing Officer	
			of the	National Labor Relati	ions Board
at 11500 W. Olympic Blvd., Suite 6	00				
in the City of Los Angeles					
on January 29, 2018		at	9:00 am	or any	adjourned
	RadNet Management,	Inc. d/b/a San Fe	rnando Val	lev Interventional R	Radiology

and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)

or rescheduled date to testify in

(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBFVT

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

Thath-

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

RETURN OF SERVICE

age, I duly served a copy of this subpoena	y of this	subpoena
		by person
		by certified mail
		by registered mail
		by telegraph
(Check method		by leaving copy at principal office or place of business
on the named person on		
(Ma	onth, da	(Month, day, and year)
(Name o	f perso	(Name of person making service)
(0	Official t	(Official title, if any)
CERTIF	CATIC	CERTIFICATION OF SERVICE
I certify that named person was in	person	was in
attendance as a witness at	at	
on		
(Month,	day or	(Month, day or days, and year)
(Name	of per	(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER

: Case No.

: 31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBFVT

By service of Subpoena *Duces Tecum* No. B-1-ZPBFVT, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production,

identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Ryan Carrillo.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs You that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to You, the Union, the NUHW, or any Employee.

- 3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.
- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to any Employee in which the You make any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to the NUHW, including but not limited to Ms. Sophia Mendoza, in which You make any reference to any police report that may be

filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW, including but not limited to Ms. Sophia Mendoza, to the You in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT NATIONAL LABOR RELATIONS BOARD RC PETITION

DO NOT WRITE IN THIS SPACE

Case No. 31-RC-208646

Date Filed

10/26/2017

INSTRUCTIONS: Unless e-Filed L	sing the Agen	cv's website, v	www.nirb.gov. submit	an original of th	is Patition to	on NI DD office in the Decine
in which the employer concerned	t is located. Ti	ie delition mus	st be accompanied by	hath a chowing	of interpet les	abadilitan a lane laurlad d'A ac
of service snowing service on the	e employer and	i all other parti	es named in the netit	ion of: (1) the ne	fition: (2) Stat	ament of Docition form
(Form NLKB-DUD); and (3) Descri	otion of Repres	Sentation Case	Procedures (Form N)	LRB 4812). The	showing of in	terest should only be filed
with the NLRB and should not be	served on the	employer or a	ny other party.			
PURPOSE OF THIS PETITION: RC-D bargaining by Petitioner and Petitioner requests that the Netional Labor Rei Za. Name of Employer						
		1 2G P	ddress(es) of Establishme	nt(s) involved (Street	and number cin	State 7/P code)
RadNet Inc. and Radnet Manageme		oyers see	attachment			,
Sa. Employer Representative - Name a Christopher Catalano	L tomotion		3b. Address (if same a 18133 Ventura B	as 2h - state same) Ivd, Suite 100,	Tarzana, C	A 91356
3c. Tel No (818) 933-2020 ext 1261	3d. Cell No. (805) 750-	1013	3e. Fax No.	***************************************	3f. E-Mail Add	ress
4a. Type of Establishment (Factory, mine, Healthcare facility	wholesaler, etc.)	4b. Principal pr	oduct or service		5a. City	ano@radnet.com and State where unit is located:
5b. Description of Unit Involved		Outpatient	maging services		see att	achment
Included: All full-time, and requ	ular part-time	, per diem R	N and Technical er	mployees, emp	loyed by	Sa. No. of Employees in Unit. 115
the employer at its fa Excluded: All other employees, man supervisors as defined by	agers, confident the Act.	ial employees, (guards, physicians, serv	rice, office clericals		5b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes I V No
Check One: 7 7a. Request for	recognition as Bar	gaining Represent	ative was made on (Date)	10/11/2017	nd Employer dec	lined recognition on or about
1 11/1/1/2	Ulf (Deta)	(If no reply receive	ect so state)			A COLUMN TO THE PROPERTY OF THE WAY
8a. Name of Recognized or Certified Ba	currently recognize	ed as Bargaining f	Representative and desires	certification under th	e Act.	
none	s Remark & Rant Is	i none, so state).	8b. Address			
BC Tel No.	8d Cell No.		Se. Fax No.		8f. E-Mail Add	7855
eg. Affiliation, if any			8h. Date of Recognition of	or Certification		Date of Current or Most Recent (Month, Day, Year)
a, is there now a strike or picketing at the	Employer's establi	shment(s) involved	1? no itso appro	ximately how many e	malayana are as	Scientians
(Name of labor organization)			keted the Employer since (mpayon are pa	and and all and
10. Organizations or individuals other than known to have a representative interest in	Petitioner and tho	the representation December	Cond D coblete has a 2.2		and a material and a second	Table 1
none	any employees in	the unit described	in item 5b above. (If none	e. so state)	Neverted Acc Size	tioner organizations and individuals
10s. Name	10b. Ad	d/esa		10c, Tel, No.	***************************************	10d. Call No.
				10s, Fax No.		10f, E-Maß Address
Election Details: If the NLRB conductions any such election.			ur position with respect to	11a, Election Type	: Manual [Mail Mixed Manual/Mail
13b. Election Date(s); MB/BG7K4D45/2862 11/7/17-11	ma in m	edilon Time(s):		11d. Election Loca	tion(s):	***************************************
National Union of Healthcare World	ocai name and m kers		***************************************		el and number, c	sty, state, and ZIP code) meryville, CA 94608
12c. Full name of national or international inone	abor organization	of which Petitioner	is an affiliate or constituen	it (if none, so state)		nay ma, on 94000
t2d. Tel No. (510) 834-2017	12e. Cell No.		12f, Fax No.		12g. E-Matl Ad	drese
13. Representative of the Pelitioner who	will accept servi	ce of all papers f	or purposes of the repres	entation proceeding	8	
13a Name and Title Sophia Me	ndoza, O	rganizer	13b. Address (street and 225 W. Brosdway, Shite 155	d number, city, state.		
13c. Tel No.	13d, Cell No. (213) 280-005		13e, Fax No. (818) 241-0141	***************************************	13f. E-Mail Add	
I declare that I have read the above petil	ion and that the	tatements are tr	se to the best of my know	viedge and hollo?	smendoza@n	unw.org .
Name (Print)	suited and and	Al. An	1 Title		15	
Florice Hotimen WILLFUL FALSE STATEME	SUBJULA	40HOM	M Attorney		Date 14P16	10/24/17
THE COURSE OF THE PARTY OF THE	THE PERSON	May me BE	TUNIONEU BY FINE AND	EMPRISONMENT (U	S. CODE, TITLE	18, SECTION 1001)

PRIVACY ACT STATE AND IMPRISONMENT (U.S. CODE, TITLE 19, SECTION 1001)

PRIVACY ACT STATEMENT

Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942
NLRB to decline to invoke its processes.

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Ryan Carrillo</u>	o, IAMAW Loca	ll District Lodge 725, 5402 Bolsa Avenu	ie, Hu	untington Beac	ch, CA 92649	
As requested by	RadNet Man	agement, Inc. d/b/a San Fernando Vall	ey In	terventional Ra	adiology and Im	naging Center
whose address is	16311 Ventur	ra Blvd., Suite 120, Encino, CA 91436				
	(Street)	(City)			(State)	(ZIP)
YOU ARE HEREBY	REQUIRED A	ND DIRECTED TO APPEAR BEFORE		<u>a</u>	Hearing Office	r
at 11500 W. Olympic	Blvd., Suite 600			of the Na	ational Labor Re	elations Board
in the City of Los	Angeles					
on January 29, 2	018		at	9:00 am	or a	any adjourned
or rescheduled date		RadNet Management, Inc. d/b/a Sar and Imaging Center (31-RM-20938 Fernando Valley Advanced Imaging	88) ar	nd RadNet M	anagement, Ir	al Radiology ic. d/b/a San

(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records,

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBAKZ

correspondence, and documents:

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this suhnnens

by person		by person by certified mail
		by registered mail by telegraph
(Check method used.)		by leaving copy at principal office or place of business at
on the named person on		
(Mo	nth, d	(Month, day, and year)
(Name of	perso	(Name of person making service)
(0	fficial	(Official title, if any)
CERTIFI	CATIO	CERTIFICATION OF SERVICE

I certify that named person was in

attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER

: Case No.

: 31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBAKZ

By service of Subpoena *Duces Tecum* No. B-1-ZPBAKZ, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

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DEFINITIONS

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- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together

with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Ryan Carrillo.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs You that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to You, the Union, the NUHW, or any Employee.

- 3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.
- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to any Employee in which the You make any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
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EXHIBIT A

UNITED STATES GOVERNMENT NATIONAL LABOR RELATIONS BOARD RC PETITION

DO NOT WRITE IN THIS SPACE

Case No. 31-RC-208646

10/26/2017

INSTRUCTIONS: Unless e-Filed us	ing the Agency's	website, w	ww.nirb.gov, submit	an original of thi	s Petition to	an NLRB o	office in the Renion
in which the employer concerned	is located. The p	etition mus	be accompanied by	hoth a showing	of interest (s	ee 6h heln	wi and a certificati
of service showing service on the	amplover and all	other partie	es named in the netit	ion of: (1) the net	ition: (2) Sta	tomant of	Pacition form
(Form NLRB-505); and (3) Descript	tion of Represent	ation Case	Procedures (Form M	1 DR 4812) That	chowing of in	dament eko	udd oply ka filad
with the NLRB and should not be:	convoil on the em	alouer er ar	u rosanniss li mini ii.	with things into	nownig or m	iterest siin	uid uiny be med
1. PURPOSE OF THIS PETITION: RC-CE	STICLATION OF DE	pioyei oi ai	ny ounce party.	or of omeleunes state		J 80 - 20 - 20 - 20 - 20 - 20 - 20 - 20 -	
bapasining by Patitioner and Patitionar d	agines to be comilled a	se remesentati	ive of the employees. The	o Patitionne allamac t	from the Entlance	ne elemenado	trans autak nast
requests that the National Labor Rela	tions Board process	l under its pro	oper authority pursuant	to Section 9 of the N	lational Labor I	Relations Ac	:L
za. name of employer		2b. A	ddress(es) of Establishme	ent(s) involved (Street	and number, cit	ly, State, ZIP	code)
RadNet Inc. and Radnet Management		s See 2	attachment				
Sa. Employer Representative - Name and	d Title		3b. Address (if same	as 2b - state same)	WE I		
Christopher Catalano	W 1100 1100 1100 1100 1100 1100 1100 11		18133 Ventura E	livd, Suite 100,			
3c. Tel. No	3d. Cell No.		3e Fax No.		3f. E-Mail Ad	dress	
(818) 933-2020 ext 1261	(805) 750-101				chris.catal	ano@rac	inet.com
4s. Type of Establishment (Factory, mine,			oduct or service				there unit is located:
Healthcare facility	10	utpatient i	maging services		see a	tachmen	t
5b. Description of Unit Involved	•						Employees in Unit:
Included: All full-time, and regu	V and Technical e	mployees, emp	loyed by	115			
the employer at its fa	cilities in the Sa	an Fernand	do Valley Region i	isted in 2b.		Sb. Do a s	substantial number (309
Excluded: All other employees, mana	gers, confidential e	employees, g	uards, physicians, ser	vice, office clericals	and	unit wich t	of the employees in the to be represented by the
supervisors as defined by	the Act.					Petitioner	? Yes V No
Check One: 78 Request for re	ecognition as Bargain	ing Represent	ative was made on (Date)	10/11/2017 a	nd Employer de	clined recogn	nition on or about
10/11/20	017 (Date) (If n	o reply receive	ed, so state).				
7b. Petitioner is c	umently recognized a	s Baxgaining R	apresentative and desire:	s certification under th	e Act.		
8a. Name of Recognized or Certified Ber	gaining Agent (If no	ne, so state).	Sh. Address	- Control - Cont			
none							
Bc. Tel No.	8d Cell No.		8e, Fax No.		8f, E-Mail Ad	dress	
Sg. Affiliation, if any	<u> </u>		i 8h. Date of Recognition	and the state of t	1		
-25- 2 minimum i transf		1	an Date of Recognition			n Date of Current or Most Recent any (Month, Day, Year)	
		Í			Compact a d	of tomeron, re	by, reary
3. Is there now a strike or picketing at the E	molover's establishm	ent(s) involved	12 no lifeo soom	oximately how many e	molevees are s	schelenten?	
(Name of labor organization)	* **				mpayara ara p	en neutremanning:	E342************************************
	# 10 A 10		keted the Employer since				
 Organizations or individuals other than known to have a representative interest in a 	retuoner and mose r	unit decribed	i 8 and 9, which have claft in dom 5h ahous - //f non	med recognition as re-	prosentatives ar	nd other orga	nizations and individual
none	and audionlands or rem	MINE GOOD INCO	the ment and entrants. In refer	c, au atata)			
10s. Name	10b. Addres	ls .		10c, Tel. No.	energy Colonia (Mildaumento) (100	10d. Cel	i No
						300. OES 100.	
				toe, Fax No.		101. E-M	ail Address
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 Election Details: If the NLRB conducts any such election. 	s an election in this m	latter, state you	ur position with respect to	11a, Election Type	e: Manual	✓ Mail	Mixed Manual/Mail
1 to Election Date(s):	I 11c. Electi	on Time(s):		11d. Election Loca	ation(c):		
Managranousiano 11/7/17-11	191/17	11.11901000000000		1 140 2000000000000000000000000000000000	aconto).		
tza. run mame or Petnioner (including id	cai name and numb	ner)		12b. Address (stre	el and number.	city state a	nd 71P code)
National Union of Healthcare Work	ters			15201 Christia Av	e. Suite 525, I	Emeryville,	CA 94606
12c. Full name of national or international is	abor organization of w	mich Petitioner	is an affiliate or constitue	int (if rione, so state)		******************	committee and the second secon
12d, Tel No.					- 4		
(510) 834-2017	12e. Cell No.		12f. Fax No.		12g. E-Mot A	ddress	
13. Representative of the Petitioner who	will accent service (of all nanore f	or numacos of the same	nanthing proposition			
			4				
13a. Name and Tibe Sophia Me	ndoza, Orc	lanizer	13b. Address (street at 225 W. Broadway, Santa 15		, and ZIP code)		
13c. Tel No.	13d, Cell No.		13e, Fax No.	22, Galabase, CM 81504	1 101 5 11-11	2.3	
	(213) 280-0051		(818) 241-0141		13f. E-Mail A- smendoza@		
I declare that I have read the above petit		ements are tr	ue to the best of my kno	wiedge and belief	1-1101100000000000000000000000000000000	**************************************	
Control State Control	and the same of the	1.10	I Tale	4	I Date		
Florice Hotiman	SASSANA	OLAYA	Attorney		1200	of the last of	10/24/17
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Radnet SFV RC petition Attachments:

Center	Address	City		
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505		
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505		
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Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436		
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	OF STREET, STR		
lmaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203		
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Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335		
Liberty Pacific Advanced Imaging Farzana and Breastlink Women's maging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356		
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062		
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355		
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405		
alley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307		

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To	Custodian of Records,	IAMAW Local District Lodg	e 725, 5402 Bolsa Avenue.	Huntington Beach	CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center

whose address is

16311 Ventura Blvd., Suite 120, Encino, CA 91436

(Street) (City) (State)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE

a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 29, 2018

at 9:00 am

or any adjourned

RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)

or rescheduled date to testify in

(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBBC7

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

Thath

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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RETURN OF SERVICE

I certify that, being a person over 18 years of

I certify that named person was in attendance as a witness at	CERTIF	(0	(Name o	(Mo	on the named person on	(Check method used.)					age, I duly served a copy of this subpoena
person was in at	CERTIFICATION OF SERVICE	(Official title, if any)	(Name of person making service)	(Month, day, and year)		by leaving copy at principal office or place of business at	by telegraph	by registered mail	by certified mail	☐ by person	of this subpoena
						orincipal Isiness					

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER

: Case No.

: 31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBBC7

By service of Subpoena *Duces Tecum* No. B-1-ZPBBC7, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together

with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs the Union that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union, the NUHW, or any Employee.

- 3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.
- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to any Employee in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to the NUHW in which the Union makes any reference to any police report that may be filed or has been filed against any

Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW to the Union in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
RC PETITION

DO NOT WRITE IN THIS SPACE

Case No. 31-RC-208646

Date Filed

10/26/2017

INSTRUCTIONS: Unless e-l	iled using the	Agency's website	tenante nich	nov suhmi	t an aviainal of th	in Budikina k	an NLRB office in the Region
in which the employer con-	erned is loca	ted. The netition m	ust ha arra	mnaniori h	i an ongina oi ui u bath a chaulae	of internal	see 6b below) and a certificate
of service showing service	on the amnio	ver and all other no	roi se ecce	niquament is i im tha anti	y now a siriwing	oi interest (see on below) and a certificate
(Form NLRB-505): and (3) (asseriation of	Penracantotion Car	a Crando	i iii uie peu	uon or: (1) the pe	ution; (2) St	atement of Position form
with the MI DR and chauld	nost ka aamud	representation vas	e rraceau	es (rom n	ilks 4012). The	showing of	interest should only be filed
with the NLR8 and should	DC CERTIFIC	on the employer or	any other p	party.			A STATE OF THE STA
PURPOSE OF THIS PETITION bargaining by Petitioner and Percentists that the National La	litioner desires, to	THUN OF REPRESENT	ATIVE - A sub	stantial numb	er of employees wish	to be represen	ted for purposes of collective
requests that the National La	or Relations 8	and proceed under its	proper author	mpicyees, in Nity ourseasot	to Section 9 of the	that the follow	ring circumstances exist and
			Address(es)	of Establishmu	ent(s) involved (Stree	t and number i	Relations ACL
RadNet Inc. and Radnet Man		int Employers see	e atlachme	ent	And Allert Control		my, chair, air today
3a. Employer Representative - h	lame and Title	and the same of the same of the same of	3b. Add	ireas (N same	as 2b - state same)		
Christopher Catalano			118133	Ventura E	3lvd, Suite 100,	Tarzana	CA 91356
3c, Tel. No.	3d. Co		3e Fax	No.	71.50.50	3f. E-Meil A	
(818) 933-2020 ext 1261	(805)	750-1013	02.10.5				alano@radnet.com
4a. Type of Establishment (Factor)	, mine, wholesal	er, etc.) 4b. Principal	product or ser	vice	***************************************	1 50 0	ly and State where unit is located
Healthcare facility		Outpatient	Imaging	services		500	ittachment
5b. Description of Unit Involved	-					The state of the s	Sa. No. of Employees in Unit
Included: All full-time, and	i regular par	t-time, per diem f	RN and Te	echnical e	mplovees emr	ud havel	1115
ine employer si	hs rachines	in the San Forne	nda Valla	o Danian I	intant in 12h		5b. Do a substantial number (30%
	, managers, co	onfidential employees.	quards phy	vsirians sor	vice office derical	e and	or more) of the employees in the
supervisors as defi-	ned by the Act.			10000110, 001	rice, only denice	5 6110	unit wish to be represented by the
Check One: / 7a Requ	est for recognition	s se Osmerinina Dannun	and a fine or a second		4014470045		Petitioner? Yes 7 No
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1 1 70 Petiti	imer is comently a	programinant se Commission	(Description of the	un and declar			
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						SALE PRESIDENT	201433
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						Contract, if a	iny (Month, Day, Year)
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(Name of labor organization)	****	, has p	icketed the Er	aplayer since	(Month, Day, Year) _		A A STATE OF THE S
Organizations or individuals of:	er than Petitione	money Wearners or or or or of the 18	- A	The same of the State of the St		and contained	nd other organizations and individuals
known to have a representative into	wast in any emplo	yeas in the unit describe	ed in item 5b a	bove. (If non	e, so state)	biogramment and	na outer digentizations and individuals
T0a, Name							
, ve. martie	1	10b. Address			10c, Tel. No.		10d. Cell No.
	1				10e, Fax No.		10I. E-Mail Address
11. Election Detaile: If the NLRB	conducts an elect	ion in this matter, state v	our position w	sth reeners to	+	Service of the servic	
sitty dual) dicuduit.				and the second second	11a. Election Type	a: Manual	✓ Mail
1 jb. Election Date(s);	_	11c. Election Time(s):			11d. Election Loca	stion(s);	
MARGINIONS 11/7/1	7-11/21/17		-				
National Union of Healthcare	Ming local name	and number)			12b. Address (stre	et and number	City, state, and ZIP code)
12c. Full name of national or interna-	tional labor none	Stantian of which Parity			15801 Christie Av	e. Suite 525,	Emeryville, CA 94608
none	mounts inserts digital	scauun or which Pergon	er is an athliat	# of constitue	nt (if none, so state)		
12d. Tel No.	12e. Cr	all No.	12f, Fgx 1	lla -			
(510) 834-2017			1			12g. E-Mati /	Address
13. Representative of the Petition	er who will acce	pt service of all papers	for purposes	of the repre	sentation proceeding	a.	
13a Name and Title Conhin	Manda	a Ornanian	1 13h Add				
13a. Name and Title Sophia	MEHROY	a, Olyanizer	225 W. Bro	arlumu Santa 14	id number, city, state, 5. Glendale, CA 91264	and ZIP code;	
13c. Tel No.	13d, Ce		13e. Fax		of automotive and others	13f. E-Mail A	43
	(213) 2	30-0051	(818) 241	.0141		smendoza@	
I declare that I have read the above	a petition and ti	of the statements are t	rue to the be	st of my know	wledge and belief	1	and a second of the second of
Name (Print)	Signatur	a 11. An	_i Tdle			18:	
Florice Hotiman	Polish	MOSERIO	FRI Atterna	N.		Date	10/24/17
WILLFUL FALSE ST	TEMENTS ON	HIS PETITION AN BE	PUNISHED I	BY FINE AND	MPRISONMENT	S CODE TO	7-/9-///

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5a.
Burbank, CA
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Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

s Angeles Police Department, Discov	very Unit, 200 N. Spring Street, 19 th Floor, Los	Angeles, CA 90012	
Net Management, Inc. d/b/a	San Fernando Valley Interventional F	Radiology and Imagin	g Center
3311 Ventura Blvd., Suite 120 (Street)	, Encino, CA 91436 (City)	(State)	(ZIP)
EQUIRED AND DIRECTED T	TO APPEAR BEFORE a Hearing O	fficer	
	of th	e National Labor Rel	ations Board
Suite 600			
eles			
	at 9:00 am	or a	ny adjourned
and Imaging Co	enter (31-RM-209388) and RadNe y Advanced Imaging Center (31-F	t Management, Inc	Radiology . d/b/a San
	Suite 600 RadNet Management, Inc. d/b/a RadNet Management, Inc. d/b/a Suite 120 RadNet Management, Inc. d/b/a	Solution of the Suite 600 RadNet Management, Inc. d/b/a San Fernando Valley Interventional F	(Street) (City) (State) EQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer of the National Labor Rel Suite 600 eles RadNet Management, Inc. d/b/a San Fernando Valley Interventional and Imaging Center (31-RM-209388) and RadNet Management, Inc. fernando Valley Advanced Imaging Center (31-RM-209424)

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A-1-ZP9HUZ

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Los Angeles, CA Issued at

Dated:

January 17, 2018

Marvin Kaplan, Chairman



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RETURN OF SERVICE

	I certify that, being a person over 18 y age, I duly served a copy of this subpoena	
	g a perso	
by person	being a person over 18 years of a copy of this subpoena	

(Official title)	(Offi	
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n was in	d persor	I certify that named person was in
CERTIFICATION OF SERVICE	IFICATI	CERT
(Official title, if any)	(Official	
(Name of person making service)	of pers	(Name
(Month, day, and year)	Month, c	(7
	ň	on the named person on
by leaving copy at principal office or place of business at		(Check method used.)
by telegraph		
by registered mail		
by certified mail		
by person		
is subpoena	py of thi	age, I duly served a copy of this subpoena

.

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Custodian of Records, Los Angeles</u>	Police Department, Discovery Unit, 200 N. Spring Street	et, 19 th Floor, Los Angeles	, CA 90012	
As requested by RadN	let Management, Inc. d/b/a San Fernando Va	alley Advanced Imag	ing Center	
whose address is 14860 Rosco	pe Blvd., Suite 101, Panorama City, CA 9140	02		
(Street)	(City)		State)	(ZIP)
YOU ARE HEREBY REQUIRED	AND DIRECTED TO APPEAR BEFORE _a	Hearing Officer		
		of the National	Labor Relation	is Board
at 11500 W. Olympic Blvd., Suite 600				
in the City of Los Angeles, CA				
on <u>January 29, 2018</u>	at	9:00 am	or any a	djourned
or rescheduled date to testify in	RadNet Management, Inc. d/b/a San Fe and Imaging Center (31-RM-209388) at Fernando Valley Advanced Imaging Center (Control of the Control of	nd RadNet Manage enter (31-RM-2094)	ment, Inc. d/b	
	(Case Name and Nu	(IIDEI)		

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R. Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R. Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPAOKH

Under the seal of the National Labor Relations Board, and by direction of the

Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

A-1-ZPAOKH

RETURN OF SERVICE I certify that, being a person over 18 years of age. I duly served a copy of this subpoena	□ by person	by certified mail	by registered mail	☐ by telegraph	neck by leaving copy at principal office or place of business ed.)	on the named person on	(Month, day, and year)	(Name of person making service)	(Official title, if any)	CERTIFICATION OF SERVICE	I certify that named person was in	attendance as a witness at		(Month, day or days, and year)	(Name of person certifying)	(Official title)
l certify ti age, I duly se					(Check method used.)	on the named					I certify to	attendance as	no			

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Po	lice Department, Discovery Unit, 200 N. Spring Street, 19 st F	Floor, Los Angeles, CA 90012
As requested by Radi	Net Management, Inc. d/b/a San Fernando Valle	y Advanced Imaging Center
whose address is 14860 Rosc	oe Blvd., Suite 101, Panorama City, CA 91402	
(Street)	(City)	(State) (ZIP)
YOU ARE HEREBY REQUIRED	AND DIRECTED TO APPEAR BEFORE	a Hearing Officer
		of the National Labor Relations Board
at 11500 W. Olympic Blvd., Suite 600		
in the City of Los Angeles		
on January 29, 2018	at 9	:00 am or any adjourned
	RadNet Management, Inc. d/b/a San Ferna	ando Valley Interventional Radiology
	and Imaging Center (31-RM-209388) and	[2] [2] [2] [4] [4] [4] [4] [4] [4] [4] [4] [4] [4
or rescheduled date to testify in	Fernando Valley Advanced Imaging Cent	er (31-RM-209424)
	(Case Name and Numb	
And you are hereby requ correspondence, and documents	ired to bring with you and produce at said time a :	and place the following books, records,
	SEE ATTACHMENT	

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBEKV

Under the seal of the National Labor Relations Board, and by direction of the

Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

RETURN OF SERVICE

I certify that, being a person over 18 years of

(Offic	(Name of pe	(Month	on the named person on	(Check method used.)					age, I duly served a copy of this subpoena
(Official title, if any)	(Name of person making service)	(Month, day, and year)		by leaving copy at principal office or place of business at	by telegraph	by registered mail	by certified mail	by person	his subpoena

CERTIFICATION OF SERVICE

attendance as a witness at I certify that named person was in

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Case No.

31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBEKV

By service of Subpoena *Duces Tecum* No. B-1-ZPBEKV, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production,

identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.)	Any and all documents, including but not limited to any call logs, reports,
	notes, memoranda, or email messages related to any investigation of, or
	any contact by the Los Angeles Police Department in connection with, the
	following named individuals, from August 1, 2017 through December 31,
	2017:
	a
	b
	c
	d
	e.
2.)	Any and all documents, including but not limited to any call logs, reports,
	notes, memoranda, or email messages related to any investigation of, or
	any contact by the Los Angeles Police Department in connection with, the
	following addresses, from August 1, 2017 through December 31, 2017:
	a. · ·
	b
	c 1
	d. 5

- 3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Sophia Mendoza.
- 4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Ryan Carrillo.
- 5.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified

themselves as a member of the National United Healthcare Workers Union.

documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified themselves as a member of the International Association of Machinists and Aerospace Workers.

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

10	Custodian of Rec	coras, Los Angeles	Police Department, Discovery Unit, 200 N. Spr	ing Stre	et, 19 Floor, Los	Angeles, CA 90012	
			*				
A	s requested by	RadNet Mar	nagement, Inc. d/b/a San Fernando Va	alley Ir	terventional R	adiology and Ima	aging Center
wh	ose address is	16311 Ventui	ra Blvd., Suite 120, Encino, CA 91436				
		(Street)	(City)			(State)	(ZIP)
YO	U ARE HEREB	Y REQUIRED A	AND DIRECTED TO APPEAR BEFOR	RE	а	Hearing Officer	
					of the Na	ational Labor Re	lations Board
at	11500 W. Olympic	Blvd., Suite 600					
in t	he City of Los	Angeles					
on	January 29, 2	2018		at	9:00 am	or a	ny adjourned
or r	escheduled date	e to testify in	RadNet Management, Inc. d/b/a S and Imaging Center (31-RM-209 Fernando Valley Advanced Imag	388) a	and RadNet M	lanagement, In	-
		50 1 - w - w - w	(Case Name a				
cor	And you ar respondence, a		red to bring with you and produce at s	aid tim	e and place th	e following book	s, records,
			SEE ATTACHMEN	Γ			

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPB555

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

RETURN OF SERVICE

	on (N	I cerlify that named pe attendance as a witness at	CE	(Na		on the named person on	(Check method used.)			l certify that, be age, I duly served a
(Name of person certifying)	(Month, day or days, and year)	I certify that named person was in dance as a witness at	(Official title, if any) CERTIFICATION OF SERVICE	(Name of person making service)	(Month, day, and year)	on on	by leaving copy at principal office or place of business at	by registered mailby telegraph	□ by person□ by certified mail	certify that, being a person over 18 years of age, I duly served a copy of this subpoena
	ec	B					principal usiness			

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER : Case No.

31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPB555

By service of Subpoena *Duces Tecum* No. B-1-ZPB555, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (including but not limited to any emails or text messages), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.)	Any and all documents, including but not limited to any call logs, reports,
	notes, memoranda, or email messages related to any investigation of, or
	any contact by the Los Angeles Police Department in connection with, the
	following named individuals, from August 1, 2017 through December 31,
	2017:
	a.
	b.
	c.
	d.
	e.
2.)	Any and all documents, including but not limited to any call logs, reports,
	notes, memoranda, or email messages related to any investigation of, or
	any contact by the Los Angeles Police Department in connection with, the
	following addresses, from August 1, 2017 through December 31, 2017:
	a.
	b. *
	c. '
	d. !

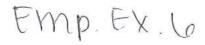
- 3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Sophia Mendoza.
- 4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Ryan Carrillo.
- 5.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified

- themselves as a member of the National United Healthcare Workers Union.
- 6.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified themselves as a member of the International Association of Machinists and Aerospace Workers.

Emp. Ex. S

Staff that worked on RadNet SFI and SFP:

- 1. Sophia Mendoza 225 W. Broadway, Suite 155, Glendale, CA 91204
- 2. Cristian Murguia 225 W. Broadway, Suite 155, Glendale, CA 91204
- 3. Ryan Carrillo 225 W. Broadway, Suite 155, Glendale, CA 91204
- 4. Keegan Cox 225 W. Broadway, Suite 155, Glendale, CA 91204





January 29, 2018

Custodian of Records Los Angeles Police Department Discovery Unit 200 N. Spring Street, 19th Floor Los Angeles, CA 90012

RE: RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology & Imaging Center; NLRB Case No. 31-RM-209388 and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center; NLRB Case No. 31-RM-209424

To Whom It May Concern,

I represent RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology & Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, the "Employers") in connection with the above-referenced cases before Region 31 of the National Labor Relations Board. Attached please find four Subpoenas being served upon the Los Angeles Police Department by the Employers in connection with the two above-referenced cases. As you know, on January 26, 2018, you were served with four subpoenas by the Employers in connection with the above-referenced cases, but you failed to appear on January 29, 2018 as requested in those subpoenas. Accordingly, the Employers trust that the mileage reimbursement accompanying the subpoenas previously served upon you will be utilized to reimburse you for your travel to the hearing on January 30, 2018 or any subsequent date, if the hearing is continued. If you have questions about the Subpoenas or the Los Angeles Police Department's compliance with the Subpoenas, please contact me at (860) 307-3223.



Sincerely,

Kaitlin A. Kaseta

Counsel for the Employers

(860) 307-3223

(843) 284-9684

kkaseta@carmodyandcarmody.com

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Custodian of Records, los Angeles Políce Department</u>
Discovery Unit, 200 Spring Street, 19th Floor, 105 Angeles, CA 90012
As requested by Radnet management, inc. albia san
Fernando Valley Advanced Imaging Center
whose address is 14800 ROSCOE Blvd, Suite 101, Panorama City CA 91402 (Street) (City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Heaving Officer
of the National Labor Relations Board
at 11500 West Olympic Blvd, Suite 600
in the City of LOS Angeles
on January 30, 2018 at 9:00 am or any adjourned
RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley
Advanced Imaging Center
or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUM7ZR

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Thath-

Issued at

Dated:

SOR RELATIONS

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

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rtify that, being a person over 18 years of

(Official title, if any)	(Official
(Name of person making service)	(Name of pers
(Month, day, and year)	(Month, d
T .	on the named person on
by leaving copy at principal office or place of business at	(Check method used.)
by telegraph	
by registered mail	
by certified mail	
by person	
s subpoena	age, I duly served a copy of this subpoena

CERTIFICATION OF SERVICE

I certify that named person was in

attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To custodian of R	ecords, Los Angele	s police Dep	artmen	t
Discovery unit, 2	OON Spring Stre	et, 19th Floor,	Los Angel	es, CA 90012
As requested by Rac	dNet managemer	it, inc d/b	a sant	ernando
valley interventi	onal Radiologi	1 + Imagine	g center	
whose address is \(\frac{\log 311 \ \times}{\log (Street)}\)	entura Blvd, Suite	(City)	O CA (State	91436 (ZIP)
YOU ARE HEREBY REQUIRED	AND DIRECTED TO APPEAR B	efore a Hea	uring of	ficer.
***************************************		of th	ne National Lab	or Relations Board
at 11500 West Oly	mpic Blvd, suite	600		2 2
in the City of Los Ange	les	10.30 - 00.000		
on January 30, 2	018	at 9:00	am	or any adjourned
or rescheduled date to testify in	RadNet Management, Inc. d/ and Imaging Center and Rad Advanced Imaging Center Cases 31-RM-209388 and 31	Net Management, In		
8	(Case Na	ame and Number)		*

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUMBIP

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

OR HELSTON

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

I certify that, being a person over 18 years of

(0)	(Name of	(Mor	on the named person on		(Check method used.)					age, I duly served a copy of this subpoena
fficial	pers	nth, c								of th
(Official title, if any)	(Name of person making service)	(Month, day, and year)			by leaving copy at principal office or place of business	by telegraph	by registered mail	by certified mail	by person	is subpoena

CERTIFICATION OF SERVICE

I certify that named person was in

attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, los Angeles Políce Department
Discovery Unit, 200 North Spring Street, 19th Floor, Los Angeles,
As requested by Radhet Management inc d/b/a San Fernando Valley Adv Imaging of
whose address is 14800 Roscee Blud, Suite to 1 Panorama city CA 91402 (Street) (City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer
of the National Labor Relations Board
at 11500 w. orympic Blvd., Suite 600
in the City of los Angeles
on <u>Tanuary 30, 2018</u> at <u>9:00 am</u> or any adjourned
RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:
SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMHQB

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

RELATION S III

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

(Name of p	on (Month, day o	I certify that named person was in attendance as a witness at	CERTIFICAT	(Officia	(Name of pers	(Month, c	on the named person on	(Check method used.)					I certify that, being a person over 18 years of age, I duly served a copy of this subpoena
(Name of person certifying)	(Month, day or days, and year)	on was in	CERTIFICATION OF SERVICE	(Official title, if any)	(Name of person making service)	(Month, day, and year)	2 (2) (2) (2) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4	by leaving copy at principal office or place of business at	by telegraph	by registered mail	by certified mail	by person	son over 18 years of nis subpoena

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER : Case No.

: 31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZUMHQB

By service of Subpoena *Duces Tecum* No. B-1-ZUMHQB, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (including but not limited to any emails or text messages), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

- 1.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Keegan Cox.
- 2.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Cristian Murguia.
- 3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the

Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Pieter Clayton or Pete Clayton.

4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Joseph Solis or Joe Solis.

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director, during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMIG5

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

RELATED STATES

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

(Officia	(Name of pers	(Month, c	on the named person on	N.	used.)	(Check method					age, I duly served a copy of this subpoena
(Official title, if any)	(Name of person making service)	(Month, day, and year)			at	by leaving copy at principal office or place of business	by telegraph	by registered mail	by certified mail	by person	nis subpoena

CERTIFICATION OF SERVICE

I certify that named person was in

attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER : Case No.

: 31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZUMIG5

By service of Subpoena *Duces Tecum* No. B-1-ZUMIG5, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (including but not limited to any emails or text messages), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

- 1.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Keegan Cox.
- 2.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Cristian Murguia.
- 3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other

- communication received from an individual identifying themselves as Pieter Clayton or Pete Clayton.
- 4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Joseph Solis or Joe Solis.

EMP. EX.7

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPB66D

Under the seal of the National Labor Relations Board, and by direction of the

Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

I certify that, being a person over 18 years of

age, I duly served a copy of this subpoena	y of thi	is subpoena by person
		by certified mail
		by registered mail
		by telegraph
(Check method used.)		by leaving copy at principal office or place of business at
on the named person on	_	
(M	onth, d	(Month, day, and year)
(Name o	of pers	(Name of person making service)
0	Official	(Official title, if any)
CERTI	FICAT	CERTIFICATION OF SERVICE
I certify that named person was in	perso	n was in
attendance as a witness at	at	
on (Month	i, day o	(Month, day or days, and year)
	8	5
(Nan	ne of p	(Name of person certifying)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Joe Solis, 420 COO'	idge Drive, Suite 130
FOLSOM, CA 95631	
As requested by Radnet N	anagement, Inc. d/b/a
San Fernando Valley In	erventional kadiology + Imaging Co
	(City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTI	
	of the National Labor Relations Board
at 11500 W. Olympic F	Ivd., Suite 600
in the City of LOS ANGELES	
on January 30, 2018	at 9:00 am or any adjourned
and Imaging	Agement, Inc. d/b/a San Fernando Valley Interventional Radiology Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Iley Advanced Imaging Center (31-RM-209424) (Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPB4MT

Under the seal of the National Labor Relations Board, and by direction of the

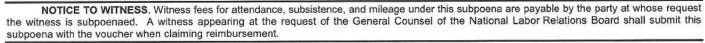
Board, this Subpoena is

Issued at Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman



PRIVACY ACT STATEMENT

I certify that, being a person over 18 years of

by person by certified mail by registered mail by telegraph (Check method loffice or place of business at loffice or place of	(Month, day or days, and year)	on (Month, d
icatio	rson was in	I certify that named pe attendance as a witness at
nnth, day	cial title, if any) ATION OF SERVICE	(Offi
nth, day	erson making service)	(Name of p
	ո, day, and year)	(Mont
		on the named person on
□ by person □ by certified mail □ by registered mail □ by telegraph	by leaving copy at prim office or place of busin at	(Check method used.)
☐ by person ☐ by certified mail ☐ by registered mail] by telegraph	
☐ by person☐ by certified mail] by registered mail	
☐ by person] by certified mail	П
] by person	

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Joe Sous, le	20 Coolidge P	onive, suite	130 BIKONO 130	
FOLSOM, CA	95630		<u> </u>	
As requested by RadNe	t Management,	inc. d/bla san	remando Vo	uley A
whose address is 14860 Ro (Street)	scoe Bivd, Swtei	Ol Panorama (City)	(State)	(ZIP)
YOU ARE HEREBY REQUIRED AN	D DIRECTED TO APPEAR E	BEFORE a Hea	ning office	1
		of the	National Labor Relation	ons Board
at 11500 W. OLYM	pic Blvd, Sui	te 600		
in the City of LOS ANGE				
on January 30, 2	2018	at 9:00	am or any a	adjourned
a	RadNet Management, Inc. d nd Imaging Center (31-RM Fernando Valley Advanced	1-209388) and RadNet	Management, Inc. d	
_	(Case N d to bring with you and prod	Name and Number) uce at said time and pla	ce the following books	s, records,
	SEE ATTACH	MENT		

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

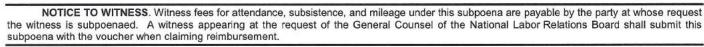
B-1-ZPBGDB

Issued at Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman



PRIVACY ACT STATEMENT

I certify that, being a person over 18 years of age, I duly served a copy of this subsection.

(Name of person certifying)	lame of p	9
(Month, day or days, and year)	nth, day	on (Mo
	ess at	attendance as a witness at
on was in	ned perso	I certify that named person was in
CERTIFICATION OF SERVICE	RTIFICAT	CER
(Official title, if any)	(Officia	
(Name of person making service)	ne of pers	(Nап
(Month, day, and year)	(Month,	
	non	on the named person on
by leaving copy at principal office or place of business at		(Check method used.)
by telegraph		
by registered mail		
by certified mail		
by person		
his subpoena	copy of the	age, I duly served a copy of this subpoena

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER : Case No.

: 31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBGDB

By service of Subpoena *Duces Tecum* No. B-1-ZPBGDB, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

1

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Joe Solis.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You, the IAMAW, or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the IAMAW, the Union or any Employee to the Los Angeles Police Department and / or any

communication from the Los Angeles Police Department to You, the IAMAW, the Union or any Employee.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You, the IAMAW or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You, the IAMAW or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the IAMAW to the Union in which reference is made to any police report that may be filed or has been filed against any

Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to You or the IAMAW in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT NATIONAL LABOR RELATIONS BOARD RC PETITION

DO NOT WRITE IN THIS SPACE Date Filed

		CARCO	175 may 257 m			
RC PETITION			0436 AD.	31-RC-208646	Date	10/26/2017
NSTRUCTIONS: Unles	s e-Filed using the Ane	ncv's website, wy	vw.nirb.gov. subm	it an original of thi	s Petition to	an NLRB office in the Regio
In which the employer	concerned is located.	The petition must	be accompanied t	by both a showing	of interest (s	ee 6b below) and a certifical
of service showing ser	vice on the employer ar	nd all other partie	s named in the per	tition of: (1) the pet	ition; (2) Star	ement of Position form
Form NLRB-505); and	(3) Description of Repri	esentation Case F	Procedures (Form	NLRB 4812). The s	howing of in	terest should only be filed
	ould <u>not</u> be served on th					
	TION: RC-CERTIFICATION					
nargaming by retitioner a recruests that the Nation	no Pasioner desires to be be al Labor Relations Board p	roceed under its oro	per authority pursuat	ne reutioner alleges : il to Section 9 of the N	lational Labor i	ng circumstances exist and Relations Act.
a. Name of Employer		2b. Ad	dress(es) of Esonblishe	nent(s) involved (Street	and number, cit	y, State. ZIP code)
	t Management Inc., Joint Em	ployers see a	ttachment			
a. Employer Representati				e as 2b - state same)	Torrana C	A 01266
hristopher Cataland			3e Fax Nu	Blvd, Suite 100,	1 St. E-Mad Ad	
3181 933-2020 ext 1	261 (805) 750	11113	se rax NU.		1000	ano@radnet.com
	actory, mine, wholesaler, etc.		Ruct or barrios			and State where unit is located
ealthcare facility	somey, turns runnsane, sa		naging services			tachment
b. Description of Unit Inv	plyed					Ba, No. of Employees in Unit
	, and regular part-tim	e, per diem RN	and Technical	employees, emp	toyed by	115
	er at its facilities in th					6b. Do a substantial number (30
excluded: All other empl	oyees, managers, confide	ntial employees, gr	uards, physicians, s	ervice, office clencal:	and	or more) of the employees in the unit wish to be represented by I
supervisors a	s defined by the Act.					Patitioner? Yes V No
heck One: 🗸 7s	Request for recognition as 9	argainino Representa	tive was made on (Da)	e:10/11/2017	nd Employer de	clinea recognition on or about
	10/11/2017 (Det					
1 70	Petitioner is currently recogn		epresantativa and nesi		e Aat	
			200			
a. Name of Recognized o	Certified Bargaining Agent	t (If none, so state).	Sb. Addres	isi		
a. Name of Recognized or ane		t (If none, so state).	Sb. Addres	s	8f. E-Mail Ad	dress
a. Name of Recognized of the c. Tel No.	Certified Bargaining Agent	t (If none, so state).	Be Fax No.			
ia. Name of Recognized of DINE IS TELNO	Certified Bargaining Agent	(If none, so state).			el Expination	chess Date of Current or Most Recent ny (Month. Day, Year)
Name of Recognized of the Cal No. Affliction, if any	Certified Bergaining Agent		Be Fax No. 8h. Date of Recognition	on or Gertification	el Expiration Contract If a	Date of Current or Most Recent ny (Month, Day, Year)
is. Name of Recognized of prie to Tel No ig. Affiliation, if any r, is there now a strike or pa	Certified Bergeining Agent 8d Cell No. Sketning at the Employer's esta	Dishmeri(s) Hyoked	the Pax No. Sh. Date of Recognition 7.00 if sq. sp.	on or Gertification	el Expiration Contract If a	Date of Current or Most Recent ny (Month, Day, Year)
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Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRs), 29 U.S.C. § 151 et seu. The principal use of the information is to assist the National Labor Relations Board (NLRs) in processing representation and related proceedings or libigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRS will further explain these uses upon request. Disclosure of this information to the NLRS is voluntary, however, fellure to supply the information will cause the NLRS to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda. CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place. Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Joe Sous, 620 Cooudge Drive, Suite 130
Folsom, CA 95630
As requested by Radnet management, inc. d/b/a santernando Vailey Intervent Ra
whose address is 14311 Ventua Blvd, Suite 120, Encino CA 914810 (Street) (City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a HEAVING OFFICER
of the National Labor Relations Board
at 11500 W. Olympic Blvd, Suite 600
in the City of LOS Angeles
on <u>January</u> 30, 2018 at 9:00 am or any adjourned
RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:
SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMFNL

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

(Name of person making service) (Official title, if any) CERTIFICATION OF SERVICE I certify that named person was in attendance as a witness at on (Month, day or days, and year)	on the named person on (Month, day, and year)	by person by certified mail by registered mail by telegraph (Check by leaving copy at principal office or place of business at	I certify that, being a person over 18 years of age, I duly served a copy of this subpoena
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UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER : Case No.

: 31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZUMFNL

By service of Subpoena *Duces Tecum* No. B-1-ZUMFNL, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

1

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Joe Solis.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You, the IAMAW, or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the IAMAW, the Union or any Employee to the Los Angeles Police Department and / or any

communication from the Los Angeles Police Department to You, the IAMAW, the Union or any Employee.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You, the IAMAW or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You, the IAMAW or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the IAMAW to the Union in which reference is made to any police report that may be filed or has been filed against any

Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to You or the IAMAW in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT NATIONAL LABOR RELATIONS BOARD R.C. PETITION

DO NOT WRITE IN THIS SPACE

8646

Date Filed

10/26/201

Case No 31-RC-208646

10/26/2017

NU FE	IIIIWN				
INSTRUCTIONS: Unless e-Filed u	sing the Agency's website, <u>w</u> v	vw.n!rb.gov, submit a	n original of this P	etition to ar	n NLRB office in the Region
in which the employer concerned	is located. The petition must	be accompanied by i	ooth a showing of i	nterest (se	e 6b below) and a certificate
of service showing service on the (Form NLRB-505); and (3) Descrip	employer and all other partie tion of Representation Case I	s named in the petitio Procedures (Form NL)	n of: (1) the petitio RB 4812). The sho	n; (2) State wing of Inte	ment of Position form erest should only be filed
with the NLRB and should not be	served on the employer or an	y other party.			
PURPOSE OF THIS PETITION: RG-C pargaining by Patitioner and Patitioner requests that the National Labor Rel	desires to be certified as representative	ve of the employees. The	Petitioner alleges that	the following	circumstances exist and
2a. Name of Employer	2b Ad	idress(es) of Establishmen	t(s) involved (Street and	number, city,	State, ZIP code)
RadNet Inc. and Radnet Managemen	nt Inc. Joint Employers see a	ittachment			
3a. Employer Representative - Name at Christopher Catalano	nd Title	36. Address (if same as 18133 Ventura Bl	vd, Suite 100, Ta		
3c. Tel No (818) 933-2020 ext 1261	3d, Cell No (805) 750-1013	3e. Fax No.			no@radnet.com
4a. Type of Establishment (Factory mine Healthcare facility	그 아이들이 아이들이 아들아 아들은 아이들은 아이들이 되었다. 그는 그는 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그	maging services			and State where unit is located achment
5b. Description of Unit involved	- Jagarana II	11113113 33111133		1	6s. No. of Employees in Unit
included: All full-time, and regi	ular part-time, per diem RN	and Technical en	ployees, employ	red by	115
the employer at its fa	acilities in the San Fernance	to Valley Region lis	sted in 2b.		6b. Do a supstantial number (30% or more) of the employees in the
Excluded: All other employees, man supervisors as defined by	agers, confidential employees, go the Act.	uards, physicians, servi	ce, office clericals ar	nd	unit wish to be represented by the Patitioner? Yes / No
10/11/2	recognition as Bargainino Représents 017 (Date) (If no reply receive currently recognized as Bargaining R	rd, so state;			fined recognition on or about
3a. Name of Recognized or Cartified Ba		Sb. Address	GUITTE GUITT GETTE GETTE	-	
none					
8c Tel No.	5d Gall No.	Be Fax No	1	st. E-Maii Addi	度55
ag. Affiliation, if any		8h. Date of Recognition of			Date of Current or Most Recent y (Month: Day, Year)
9. Is there now a strike or picketing at the	Employer's establishment(s) involved	1? <u>no</u>	smately now many emp	ocycles are pa	ricipating"
(Name of labor organization)	, has pick	keted the Employsi since (Month, Day, Year)		
10. Organizations or individuals other than shown to have a representative interest in				sentatives and	d other organizations and individuals
none 10a, Name	10b. Address		1Dc. Tel No.		Too Cell No.
ivs. (waits	100 Address				
			10e, Fax No.		101. E-Mail Address
11 Election Details: If the NLRB condu- any such election	ots an election in this malter, state you	ur possion with respect to	11a, Election Type Manual V Mini Missen Manual/Mass		
116 Election Date(s) Multiagranziasizativ 11/7/17-1	11c. Sleption Time(s)		11d Election Location	n(s)	
12a. Full Name of Petrioner (including National Union of Healthcare Wo	(ocal name and number)	390-280-280-280-280-280-280-280-280-280-28	12b Address (street 15801 Christie Ave.	and number, Suite 525, E	uty, state, and ZIP code) meryville, CA 94608
12c. Full name of national or international		r is an affiliate or constituer	A company of the same of the s		The second secon
note 12d Tel No				and the second second	
(510) 834-2017	12e, Cell No	:2º Fax No.		12g E-Mell Ac	Milets
13. Representative of the Peritioner wit	o will accept service of all papers f				
13th Name and Title Sophia Me	endoza, Organizer	13b Address (street an 225 W. Brondway, Sone 15	id number, city, stele, at 5, Givenavi, CA 91204	nd ZIP code)	
13c, Tel No.	13d, Cell No (213) 280-0051	13e. Fex No. (818) 241-0141		131. E-Mail Ad mendoza@r	
I declare that I have read the above pe		THE CASE OF LABOUR DESIGNATION OF THE CO.	THE RESERVE THE PARTY OF THE PA		
Name (Print) Florice Hoffman	Juny Oloffin	Tale Attorney		Date 120%	10/24/17
WILLFUL FALSE STATES	MENTS ON THIS PETITION ON BE	PUNISHED BY FINE AND	IMPRISONMENT (U.S	CODE, TITL	E 18, SECTION 1001)

WILLFUL FALSE STATEMENTS ON THIS PETITION AND BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT
Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 20 U.S.C. § 151 of sep. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or idigation. The noutrie uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Occ., 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary, however, fellure to supply the information will cause the NLRB to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
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Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place. Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

EmpEX8

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton, 225 West Broadway, Suite 155
Glendale, CA 91204
As requested by Radnet management, Inc. d/b/a
San Fernando Valley Advanced imaging Center
whose address is 14840 ROSCOE BLVA, Suite LOI Panorama City, CA 91402 (Street) (City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Heaving Officer
of the National Labor Relations Board
at 11500 W. Olympic Blvd, Suite 600
in the City of LOS ANGELLS
on January 30, 2018 at 9:00 am or any adjourned
RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424) (Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPB2WB

Under the seal of the National Labor Relations Board, and by direction of the

Board, this Subpoena is

Issued at

Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman



NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

A-1-ZPB2WB

RETURN OF SERVICE

I certify that, being a person over 18 years of

ige, I duly served a copy of this subpoena	his subpoena
	by person
	by certified mail
	by registered mail
	by telegraph
(Check method used.)	by leaving copy at principal office or place of business at
on the named person on	
(Month,	(Month, day, and year)
(Name of per	(Name of person making service)
(Offici	(Official title, if any)
CERTIFICA:	CERTIFICATION OF SERVICE
I certify that named person was in	on was in

attendance as a witness at

암

(Month, day or days, and year)

(Name of person certifying)

(Official title)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Pieter Clayton, 225 West Broadway, Suite 155</u>
Crundale, CA 91204
As requested by Radhet Management, Inc. d/b/a
San Fernando Valley Interventional Radiology + Imaging Cent
whose address is 10311 Ventura Blvd, Suite 120, Encino CA 91436 (Street) (City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing of ficer
of the National Labor Relations Board
at 11500 W. Olympic Blvd, Suite 600
in the City of LOS ANGELLS
on January 30, 2018 at 9:00 am or any adjourned
RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUMBSF

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Thath-

Issued at

Dated:

RELATION S BOUND & OUTE OF STREET

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Name of person making service)	(Month, däy, and year)	on the named person on		(Check by le method office used.)	☐ by te	☐ by re	□ by се	□ ву ре	age, I daily served a copy of this suppoend
ing service)	year)			by leaving copy at principal office or place of business at	by telegraph	by registered mail	by certified mail	by person	oena

CERTIFICATION OF SERVICE

(Official title, if any)

I certify that named person was in

attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton, 225 W.	Broadway, Suite 155
Glendale, CA 91204	1,7
As requested by RadNet Management, 1	inc. d/b/a San Fernando Valley inc. d/b/a Advanced imaging cent
	(City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR	RBEFORE a Heaving Officer
	of the National Labor Relations Board
at 11500 W. Olympic Blvd, Su	uite 600
in the City of LOS Angeles	
on January 30, 2018	at 9:00 am or any adjourned
and Imaging Center (31-R or rescheduled date to testify in Fernando Valley Advance	RM-209388) and RadNet Management, Inc. d/b/a San ed Imaging Center (31-RM-209424)
	e Name and Number) oduce at said time and place the following books, records,
SEE ATTAC	CHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBN1B

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los

Los Angeles, CA

Dated:

January 17, 2018



Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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B-1-ZPBN1B

RETURN OF SERVICE

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	I duly s	l certi
	serve	fy that
	served a copy of this s	, being
	py of t	being a person over 18 y
7	nis su	son o
Porcon	subpoena	ver 18
3	าล	years of

age, I duly served a copy of this subpoena by person by person by certifie by registe (Check method used.) on the named person on (Month, day, and yea	py of thi	duly served a copy of this subpoena by person by certified mail by registered mail by leaving copy at principal office or place of business at
method used.)	3 [at at
()	∕lonth, d	ay, and year)
(Name	of perso	(Name of person making service)
	(Official	(Official title, if any)
CERTIFICATION OF	IFICATI d persor	CERTIFICATION OF SERVICE named person was in
attendance as a witness at	ss at	
on (Mont	ih, day o	(Month, day or days, and year)
(Nai	me of pe	(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Case No.

31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBN1B

By service of Subpoena *Duces Tecum* No. B-1-ZPBN1B, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Pieter Clayton.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT NATIONAL LABOR RELATIONS BOARD RC PETITION

DO NOT WRITE IN THIS SPACE

31-RC-208646

10/26/2017

INSTRUCTIONS: Unless e-Filed us	sing the Agend	y's website, w	ww.n!rb.gov, submit a	an original of thi	s Petition to	an NLRB office in the Region	
in which the employer concerned							
of service showing service on the							
(Form NLRB-505); and (3) Descrip							
with the NLRB and should not be	served on the	employer or an	y other party.				
PURPOSE OF THIS PETITION: RC-CI	ERTIFICATION O	FREPRESENTAT	IVE - A substantial number	of employees wish	n be represente	ad for purposes of collective	
requests that the National Labor Rela	itions Board pro	deed under its pro	ve or the employees. The later authority pursuant to	Petitioner anages to Section 9 of the N	nat me tollowii lational Labor F	Relations Act	
2s. Name of Employer		2b. Ar	idrass(es) of Exablishmen				
RadNet Inc. and Radnet Managemen		oyers See a	ittachment				
Na. Employer Representative - Name an Christopher Catalano	d Titte		36. Address (if same as 118133 Ventura Bi		Тагуапа С	A 01356	
3c. Tel No	3d, Cell No		Je Fax No	40,0000 100,	31 E-Atail Acc		
(818) 933-2020 ext 1261	(805) 750-				The state of the s	ano@radnet.com	
4s. Type of Establishment (Factory, mine.	wholesaler, etc.)					and State where unit is located	
Healthcare facility		Outpatient II	naging services		see at	tachment	
6b. Description of Unit involved included: All full-time, and regu	lar nart-timo	ner diam Pi	na technical are	anlavees emn	larged hy	6s, No. of Employees in Unit 1115	
the employer at its fa	cilities in the	San Farman	to Voltov Dagias lie	nod in Th	chan na	6b. Do a substantial number (30%)	
Excluded: All other employees, mana	connes ni trio	ial composes a	no veney region is	on office alexande	man!	or more) of the employees in the	
supervisors as defined by	the Act.	iai empriyees, E	uarus, priyacidirs, servi	Le, unus ciencas	enu	unit wish to be represented by the	
The state of the s	-			014480047		Petitioner? Yes / No	
		датило кергезели (Я по терју гесегие		10030017	nd Employer de	clinea recognition on or about	
			epresentative and desires	contilication under th	n Art		
24. Name of Recognized or Certified Sa			Sh. Address	And the same of the same of	-		
80 Tel No.	8d Cell No.		Be Fax No		8f, E-Mail Ad	dress	
3g. Affiliation, if any			8h. Date of Recognition of	r Geréfication	8i Expiration	Date of Current or Most Receni	
			VIII 34111 & 1133431.111111 41	T Gastanian Cont		ny (Month, Day, Year)	
s. In there now a strike or picketing at the l	molovera establi	ahment(s) involved	? no tso appropr	omately how many e	mpicyces are o	articination?	
(Name at tabar organization)			seted the Employer since (The state of the s	
10. Organizations or individuals other than	Petitioner and the				nonentalives ar	M other worm appears and activities	
snown to have a representative interest in	any amployees in	the unit described	in item 56 above. (Moone	so s/ate/	21 14 21 11 11 11 11 11 11 11 11 11 11	to core to generality with the property	
none							
toa. Name	10b Ac	ldress		10c. Tel. No.		10d Gell No	
				10e Fax No.		101, E-Mail Address	
				Tou. Television		TOTAL TRANSPORTED S	
11 Election Details: If the NLRB conduct any such election	is an election in th	ns matter, state you	ir position with respect to	11a, Election Typ	e: Manual]	J Mail Miseed Manual/lusin	
1 tb. Election Date(s)	11c. E	Tection Time(s)		11d Election Location(a)			
12a. Fult Name of Petitioner (including i	ocal battle end u	umber)		12b Address (str.	eet and number,	bity, state, and ZIP code)	
National Union of Healthcare World				5801 Christie Av	e. Suite 525, f	Emeryville, CA 94608	
12c. Full name of national or international in	abor organization	of which Petitioner	is an affiliate or constituen	it (if none, so state)			
12d Tel No	12e. Cell No		125, Fax No.		I 12g E-Mart A	defined a	
(510) 834-2017	The same of the same		HAST PHASE DIGI.		1.2g / IZ-ment A	CCI 455	
13. Representative of the Pelitioner who	will accept serv	ice of all papers f	or purposes of the regres	sentation proceeding	ig-		
13s. Name and Tide Sophia Me	ndoza, C)rganizer	13b Address (street and 225 W. Browdowy, Steet 15b		and ZIP code)		
13c, Tel No.	15a, Cell No.		tãe, Pax No.	- MARIE DE 0 1254	13f. E-Mail A		
deslare that I have read the above petl	(213) 280-005 Son and that the		(818) 241-0141	viedge and belief	smendoza@	nunw.org	
	SHOW AND ALL	Al BA	Title		Date		
Flance Hoffman	Stable	HOHOM	84 Attresses		1,736	10/24/17	
WILLFUL FALSE STATEM	ENTS ON THIS P	ETITION ON BE	PUNISHED BY FINE AND	MAPRISONMENT	I.S. CODE, TIT	LE 18, SECTION 1001)	

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Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
lmaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place. Suite 210	West Hills, CA 91307

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Burbank, CA
Encino, CA
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Reseda, CA
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Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton	225 W. Broadw	al	1, SU	ite 18	55
Glendale, CA	91204		, ,		
As requested by RadNet	Management, Inc.	d/b	la san	Event	Radiology+Im
whose address is I Lo 3 II Venture (Street)	a Blud, suite 120, E	nc	ino	CA (Sta	11436 CV. (ZIP)
YOU ARE HEREBY REQUIRED AND D	DIRECTED TO APPEAR BEFORE	_0	r Hear	ning	Officer
			of the N	National La	bor Relations Board
at 11500 W. OLYMp	pic Blvd, Suite	6	00		
in the City of LOS ANGEL	es				
on January 30, 2	.018	_at	9:00	am	or any adjourned
or rescheduled date to testify in Fern	Net Management, Inc. d/b/a San Imaging Center (31-RM-20938) nando Valley Advanced Imaging (Case Name and b bring with you and produce at sa	8) and g Cen d Num	d RadNet M ter (31-RM nber)	Manageme 1-209424)	ent, Inc. d/b/a San
	SEE ATTACHMENT				

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBK2D

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

m.

Issued at

Los Angeles, CA

Dated:

January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seg. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

RETURN OF SERVICE

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by person	t, being a person over 18 years of a copy of this subpoena

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(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER : Case No.

: 31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZPBK2D

By service of Subpoena *Duces Tecum* No. B-1-ZPBK2D, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Pieter Clayton.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

UNITED STATES GOVERNMENT VATIONAL LABOR RELATIONS BOARD RC PETITION

DO NOT WRITE IN THIS SPACE

31-RC-208646

10/26/2017

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nirb.gov, submit an original of this Potition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form

(Form NLRB-505); and						
with the All DD and after	uld not be convert on the emit	loyer or any	other party.			Jacob and a second
PURPOSE OF THIS PET	TION: RC-CERTIFICATION OF REP nd Petitioner desires to be certified as	RESENTATIV	/E - A substantial number	of employees wan t Potitioner alleges ti	at the follows	ng circumstances exist and
requests that the Nation	al Labor Relations Board proceed t	wanted and the capturer	OF INCHIDATION WINDSHIP TO	25 SECTION S OF SIMPOW	THOUSE LEIDER F	THEREIGH PARTY
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	Management Inc. Joint Employers	see at	trachment	The same of the sa		
Ja. Employer Representati Christopher Catalant			36. Address (# same as 18133 Ventura Biv	26 - state same) vd., Suite 100,		
3c. 7st No (818) 933-2020 ext 1	261 (805) 750-1013	2	3e. Fax No.		St. E-Mail Ad chris Catal	dress lano@radnet.com
	그 그 그리고 있는데 그 그 그 그 그 그 이 이 사람들이 가지 않는데 그 그 그리고 있다. 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그	Principal pros	sict of service			and State where unit is located
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the employ	er at its facilities in the Sar	n Fernand	o Valley Region lis	ited in 2b.		6b. Do a substantial number (30% or more) of the employees in the
Excluded: All other emp	oyees, managers, confidential er	mployees, gu	lards, physicians, servi	ce, office clencals	880	und wish to be represented by the
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PRIVACY ACT STATEMENT

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Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda. CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's maging	18133 Ventura Blvd Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place. Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

SUBPOENA

EMP. EX.9

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Cristian Mu</u>	guia, 225 N	lest Broad	way, S	wite is	2
Glendale, CA				S 59	T. It
As requested by Rac	Inet manag	gement,	Inc. d/b	la sar	Ĺ
Fernando valle	y Advanced	Imagino	Center		*
whose address is $\frac{14860 R}{\text{(Street)}}$	oscoe Bivd, su	ite 101 Pan (City)	orama ci	(State)	91402 (ZIP)
YOU ARE HEREBY REQUIRED	AND DIRECTED TO APP	EAR BEFORE Q	Hearing	Office	Λ
	6		of the Nation	nal Labor Rela	tions Board
at 11500 W. OLYM	pic Blud, Si	uite 400			
in the City of LOS Ang-	eles				
on January 30,	2018	at	9:00 an	ν or any	adjourned
	RadNet Management, and Imaging Center an Advanced Imaging Ce	d RadNet Manage	ment, Inc. d/b/a		
or rescheduled date to testify in	Cases 31-RM-209388	and 31-RM-20942	TAIL TO BE SEED TO BE		

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUMEFP

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

RELATION TO THE PARTY TO THE PA

Marvin Kaplan, Chairman

In Thather

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

A-1-ZUMEFP

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by person

by certified mail by registered mail by telegraph	by leaving copy at principal office or place of business at		(Month, day, and year)	(Name of person making service)	(Official title, if any)	CERTIFICATION OF SERVICE	n was in		(Month, day or days, and year)	
	(Check method used.)	on the named person on	(Month, d	(Name of person	(Official	CERTIFICATI	I certify that named person was in	attendance as a witness at	on (Month, day o	

(Name of person certifying)

(Official title)

SUBPOENA

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Cristian Murguia</u> , 225 West Broadway, Suite iss
Glendale, CA 91204
As requested by <u>Radnet Management</u> , Inc. d/b/a Radokhom
Fernando valley Interventional Radiology + Imaging Cente
whose address is 1/311 Ventura Blvd, Suite 120, Encino, CA 9143U (Street) (City) (State) (ZIP)
YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Heaving Officer
of the National Labor Relations Board
at 11500 W. Olympic Blvd, Suite 600
in the City of LOS Angeles
on January 30, 2018 at 9:00 am or any adjourned
RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424
or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUM8QF

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

RELIGION S BO

Marvin Kaplan, Chairman

. That

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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RETURN OF SERVICE

A-1-ZUM8QF

	(Nam		on the named person on	u u	used.)	(Check method					I certify that, being a person over 18 y age, I duly served a copy of this subpoena
(Official	ne of pers	(Month, d	n on								ng a perso
(Official title, if any)	(Name of person making service)	(Month, day, and year)			at	by leaving copy at principal office or place of business	by telegraph	by registered mail	by certified mail	by person	certify that, being a person over 18 years of duly served a copy of this subpoena

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

As requested by Rod Not Management, Inc. d/b/s san Fernando Valley Intervent. Radiumose address is 1481 Ventuva 1814, Suite 120, Encino, CA 91434 Whose address is 1481 Ventuva 1814, Suite 120, Encino, CA 91434 (Street) (City) (State) (ZIP) YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE A Hearing Officer of the National Labor Relations Board at 1500 W Olympic Blvd. Suite 1000 in the City of 105 Angells on Tanuary 30, 2018 at 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:	To <u>Chistian Mu</u>	rguia, 225 W	est Br	oadw	ay, su	ute	155
whose address is lubli ventura Bird, Suite 120, Encino, CA 91431/ (Street) (City) (State) (ZIP) YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE Of the National Labor Relations Board at 11500 W. Olympic Blvd. Suite 1000 in the City of 105 Angells on January 30, 2018 at 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:	Glendale, C	4 91204					
whose address is 14811 Ventura 12Wa, Suite 120, Encino, CA 9143U (Street) (City) (State) (ZIP) YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE 14 14 15 10 10 10 10 10 10 10 10 10 10 10 10 10	As requested by Rad Nel	Management, Inc, d/1	ok san H	evnando	valley h	nterver	M. Radi
of the National Labor Relations Board at NSOO W. Olympic Blvd. Suite Loo in the City of Los Angeles on Tanuary 30, 2018 at 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:				ro, CA	91431		
of the National Labor Relations Board at NSOO W. Olympic Blvd., Suite Loo in the City of Los Angeles on Tanuary 30, 2018 at 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:	(Street)	<i>y</i>	City)		(State	:)	(ZIP)
at NSOO W Olympic Blvd., Suite Loo in the City of Los Angeles on Tanuary 30, 2018 at 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:	YOU ARE HEREBY REQUIRED /	AND DIRECTED TO APPEAR B	EFORE (a Hear	ing of	Ficer	
on Tanuary 30, 2018 at 9:00 am or any adjourned RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center or rescheduled date to testify in Cases 31-RM-209388 and 31-RM-209424 (Case Name and Number) And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:				of the	National Labo	or Relatio	ns Board
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		SEE ATTACH	MENT	<u>(F)</u>			

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B-1-ZUMHKH

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

E PELLO SE

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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RETURN OF SERVICE

(Name of perso	(Month, da	on the named person on	used.)	(Check method					age, I duly served a copy of this subpoena
(Name of person making service)	(Month, day, and year)		2	by leaving copy at principal office or place of business	by telegraph	by registered mail	by certified mail	by person	subpoena

CERTIFICATION OF SERVICE

(Official title, if any)

attendance as a witness at I certify that named person was in

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER : Case No.

: 31-RM-209388

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZUMHKH

By service of Subpoena *Duces Tecum* No. B-1-ZUMHKH, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Cristian Murguia.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

- Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

Name (Print)

WILLFUL FALSE STATEMENTS ON

UNITED STATES GOVERNMENT VATIONAL LABOR RELATIONS BOARD

DO NOT WRITE IN THIS SPACE

31-RC-208646 10/26/2017 RC PETITION INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nirb.gov, submit an original of this Potition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of Interest should only be filed with the NLRB and should not be served on the employer or any other party. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer

2b. Address(es) of Examinishment(s) involved (Street and number, city, State, ZIP code) RadNet Inc. and Radnet Management Inc. Joint Employers sea attachment Sa. Employer Representative - Name and Title 3a. Address (If same as 2b - state same) 18133 Ventura Blvd, Suite 100, Tarzana, CA 91356 Christopher Catalano 3d. Cell No. Ser Face No (805) 750-1013 (818) 933-2020 ext 1261 chris.catalano@radnet.com Sir. City and State where unit is located 4s. Type of Establishment (Factory rome, wholesaler etc.) Healthcare facility Outpatient Imaging services see attachment Ra, No. of Employees in Unit 5b. Description of Unit Involved Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by 115 6b. Do a substantial number (30% or more) of the employees in the the employer at its facilities in the San Fernando Valley Region listed in 2b. Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and unit wish to be represented by the supervisors as defined by the Act. Petitioner? Yes 7 No Request for recognition as Bargaining Representative was made on Oste) 10/11/2017 and Employer declined recognition on or about Check One: 10/11/2017 [Data] (If no reply received, so state) 76. Petitioner is currently recognized as Barganing Representativit and desires certification under the Act 3s. Name of Recognized or Certified Barganing Agent (Minone, so state).

St. Address none Rf F-Mail Address So Tai No ing Affiliation if any 8) Expiration Date of Current or Most Recent 8h. Date of Recognition or Certification Contract, If any (Month Day, Year) (Name of labor organization) , has paketed the Employer since (Month, Day, Year) _ 10. Organizations or individuals other than Patisoner and those nathed in items 6 and 9, which have claimed recognition as representatives and other organizations and individuals. anown to have a representative interest in any employees in the unit described in item 5b above. (If none, so state) Ida. Name 10s Cell No 10e. Fax No. 101. E-Mail Address 11 Staction Detaile: If the NLRB conducts an election in this matter, state your position with respect to 11a, Election Type: | Manual / Mail | Mixed Manual/Mail any such election 11d Election Location(s) Adding 75-15-15-2 11/7/17-11/21/17

12a. Full Name of Petitioner (Including local name and number) 5801 Christie Ave. Suite 525. Emeryville, CA 94608 National Union of Healthcare Workers 12c. Full frame of national or intervalional labor organization of which Petitioner is an affiliate or constituent (if none, so state) 120 E-Mail Address the Pall NA 128 Eav Mo (510) 834-2017 15. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding. 13h Address (street and number, city, state, and ZIP code) 130 Name and Tide Sophia Mendoza, Organizer 325 Vs. Browdway, Strie 155, Glandale, CA 91204 13c, Fax No. (818) 241-0141 (213) 280-0051 smendoza@nuhw.org

PRIVACY ACT STATEMENT Substitutes of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 of seg. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or lidigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disciosure of this information to the NLRB is voluntary, however, fallure to supply the information will cause the NLRB to decline to invoke its processes.

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And IMPRISONMENT (U.S. CODE, TITLE 1S, SECTION 1901)

10/24/17

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Radnet SFV RC petition Attachments:

Center	Address	City			
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505			
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505			
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506			
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436			
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436			
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203			
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204			
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402			
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105			
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325			
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335			
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd Suite 100 and 200	Tarzana, CA 91356			
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062			
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355			
Vanowen Advanced Imaging	15243 Vanowen Street. Ste. 106	Van Nuys, CA 91405			
Valley Hills Imaging	23101 Sherman Place. Suite 210	West Hills, CA 9130			

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Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

To <u>Cristian Mur</u>	guia, 225 West Broadway, Suite 155
Glendale,	CA 91204
As requested by Rac	dhet management, Inc. a/b/a san Fernando Valley Adv.
whose address is 14840 (Street)	ROSCOE BIVD, Suite 101, Panorama City, CA 91402 (City) (State) (ZIP)
	AND DIRECTED TO APPEAR BEFORE a Heaving Officer
	of the National Labor Relations Board
at 11500 W. Olym	ipic Blvd, suite 1000
in the City of LOS ANG	eles
on January 30,	2018 at 9:00 am or any adjourned
or rescheduled date to testify in	RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center Cases 31-RM-209388 and 31-RM-209424
	(Case Name and Number)
And you are hereby required correspondence, and documents:	lired to bring with you and produce at said time and place the following books, records,
	SEE ATTACHMENT
E	

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMILF

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

THE SECOND SECON

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

RETURN OF SERVICE

I certify that, being a person over 18 years of

(Official title, if a CERTIFICATION OF I certify that named person was in		(Name of	(Mon	on the named person on	(Check method used.)					age, I duly served a copy of this subpoena	
erson was in	CERTIFICATION OF SERVICE	(Official title, if any)	(Name of person making service)	(Month, day, and year)		by leaving copy at principal office or place of business at	by telegraph	by registered mail	☐ by certified mail	☐ by person	of this subpoena

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

attendance as a witness at

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER : Case No.

: 31-RM-209424

Petitioner

and

NATIONAL UNION OF HEALTHCARE WORKERS

Labor Organization

ATTACHMENT TO SUBPOENA DUCES TECUM NO. B-1-ZUMILF

By service of Subpoena *Duces Tecum* No. B-1-ZUMILF, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

- 1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.
- 2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."
- 3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

- 4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.
- 5.) "You," as used below, refers to Mr. Cristian Murguia.

DOCUMENTS TO BE PRODUCED

- 1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

- 4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
- 5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.
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